

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

THADDAEUS MYRICK,)	
NICHOLAS D. BRADEN, JESSIE POPEE,)	
and KENNETH L. FOUNTAIN,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 2:19-cv-01728-MHH
)	
CITY OF HOOVER, ALABAMA,)	
)	
Defendant.)	

**Defendant City of Hoover's First Supplemental Responses
to Plaintiffs' Second Interrogatories to Defendant**

The City of Hoover supplements its previous response to interrogatory no. 1 of Plaintiffs' Second Interrogatories to Defendant as follows:

1. Excluding the Plaintiffs, from 1994 to the present, identify each employee of the City of Hoover Police Department who was on leave with pay for a period equal to or greater than 120 days, and the reason the employee was on leave with pay.

Response: Hoover objects to this interrogatory on the ground that it seeks information that is confidential regarding Hoover's non-party employees. Hoover also objects on the grounds that this interrogatory seeks information that is not relevant to the issues in this action and is not reasonably calculated to the discovery of relevant evidence. Hoover further objects to this interrogatory on the grounds that it is overly broad, is not reasonably limited in time and scope, is unduly burdensome, and is not proportional to the needs of the case. The manner in which Hoover maintains its

personnel data does is not designed to conduct a search for employees on paid leave of 120 days or more. Since its initial responses to this interrogatory, Hoover's HR and IT departments have determined a way to run a report showing each employee's total amount of leave taken by leave category. But someone still has to review the individual employee's information to determine if it was for 120 consecutive days. The reasons for the leave are not included in Hoover's electronic data. The reasons may or may not be included in the employee personnel file, and even if in the employee's personnel file, Hoover objects to providing the reasons as they likely would be considered private information on non-party employees or former employees. Even with names removed, the information might be sufficient to identify the employee or former employee.

Subject to and without waiving the foregoing objections, Hoover was able to identify three police department employees who were on Administrative Leave with Pay for more than 120 consecutive days and not for military reasons since 1994. There may be other employees of the police department who had paid leaves of 120 or more consecutive days for non-military reasons that have not been identified. (Hoover understands that this request is limited to leaves other than military leave.) Those employees will be referred to as 2891185912, 1215456659, and 4598915932 to protect the employees' identities.

Employee 2891185912 was on paid leave from April 21, 1997, to May 31, 1998, which was a total of 290 days. During that time, Employee 2891185912 accrued 182 hours of annual leave, 78 hours of sick leave, and 24 hours of personal leave. A chart showing the paid leave and accrued leave by pay period is attached.

Employee 1215456659 was on paid leave from July 30, 2012, to October 13, 2013, which was a total of 306 days. During that time, Employee 1215456659 accrued 232 hours of annual leave, 87 hours of sick leave, and 24 hours of personal leave. A chart showing the paid leave and accrued leave by pay period is attached.

Employee 4598915932 was on paid leave from March 26, 1997, to November 15, 1998, which was a total of 428 days. During that time, Employee 4598915932 accrued 280 hours of annual leave, 120 hours of

sick leave, and 48 hours of personal leave. A chart showing the paid leave and accrued leave by pay period is attached.

I am an employee of and agent for the City of Hoover, Alabama. I believe, based on reasonable inquiry, that the answer to the foregoing interrogatory is true and correct to the best of my knowledge, information, and belief.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on September 22, 2020.

The City of Hoover, Alabama

By: Mike Lewis

Printed Name: Mike Lewis

Title: Human Resources Director

As to objections:

Michael L. Jackson
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Certificate of Service

I certify that on September 22, 2020, I served a copy of the foregoing discovery responses on the following counsel by email in accordance with Fed. R. Civ. P. 5(b)(2)(E) as follows:

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Michael L. Jackson
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Employee 2891185912 — Page 1

Anonymous Employee No.	Pay Period	Type of Leave	Pay Period No.	Hours	Days	Accrued Annual Leave Hours	Accrued Sick Leave Hours	Accrued Personal Leave Hours	Notes
2891185912	4/21/1997 to 5/4/1997	Annual Leave	10	40	5	7	3		
2891185912		Admin Leave w/Pay		40	5				
2891185912	5/5/1997 to 5/18/1997	Admin Leave w/Pay	11	80	10	7	3		
2891185912	5/19/1997 to 6/1/1997	Holiday	12	8	1	7	3		
2891185912		Admin Leave w/Pay		72	9				
2891185912	6/2/1997 to 6/15/1997	Admin Leave w/Pay	13	80	10	7	3		
2891185912	6/16/1997 to 6/29/1997	Admin Leave w/Pay	14	80	10	7	3		
2891185912	6/30/1997 to 7/13/1997	Holiday	15	8	1	7	3		
2891185912		Admin Leave w/Pay		72	9				
2891185912	7/14/1997 to 7/27/1997	Admin Leave w/Pay	16	80	10	7	3		
2891185912	7/28/1997 to 8/10/1997	Admin Leave w/Pay	17	80	10	7	3		
2891185912	8/11/1997 to 8/24/1997	Admin Leave w/Pay	18	80	10	0	0		
2891185912	8/25/1997 to 9/7/1997	Holiday	19	8	1	7	3		
2891185912		Admin Leave w/Pay		72	9				
2891185912	9/8/1997 to 9/21/1997	Admin Leave w/Pay	20	80	10	7	3		
2891185912	9/22/1997 to 10/5/1997	Admin Leave w/Pay	21	80	10	7	3		
2891185912	10/6/1997 to 10/19/1997	Admin Leave w/Pay	22	80	10	7	3	24	
2891185912	11/7/1997 to 11/2/1997	Admin Leave w/Pay	23	80	10	7	3		
2891185912	11/3/1997 to 11/16/1997	Holiday	24	8	1	7	3		
2891185912		Admin Leave w/Pay		72	9				
2891185912	11/17/1997 to 11/30/1997	Holiday	25	16	2	7	3		
2891185912		Admin Leave w/Pay		64	8				
2891185912	12/1/1997 to 12/14/1997	Admin Leave w/Pay	26	80	10	7	3		
2891185912	12/15/1997 to 12/28/1997	Holiday	1	16	2	7	3		
2891185912		Admin Leave w/Pay		64	8				

Employee 2891185912 — Page 2

Anonymous Employee No.	Pay Period	Type of Leave	Pay Period No.	Hours	Days	Accrued Annual Leave Hours	Accrued Sick Leave Hours	Accrued Personal Leave Hours	Notes
2891185912	12/29/1997 to 1/11/1998	Holiday	2	16	2	7	3		
2891185912		Admin Leave w/Pay		64	8				
2891185912	1/12/1998 to 1/25/1998	Admin Leave w/Pay	3	80	10	0	0		Nobody Accrued
2891185912	1/26/1998 to 2/8/1998	Admin Leave w/Pay	4	80	10	7	3		
2891185912	2/9/1998 to 2/22/1998	Admin Leave w/Pay	5	80	10	7	3		
2891185912	2/23/1998 to 3/8/1998	Admin Leave w/Pay	6	80	10	7	3		
2891185912	3/9/1998 to 3/22/1998	Admin Leave w/Pay	7	80	10	7	3		
2891185912	3/23/1998 to 4/5/1998	Admin Leave w/Pay	8	80	10	7	3		
2891185912	4/6/1998 to 4/19/1998	Holiday	9	8	1	7	3		
2891185912		Admin Leave w/Pay		72	9				
2891185912	4/20/1998 to 5/3/1998	Admin Leave w/Pay	10	80	10	7	3		
2891185912	5/4/1998 to 5/17/1998	Admin Leave w/Pay	11	80	10	7	3		
2891185912	5/18/1998 to 5/31/1998	Holiday	12	8	1	0	0		
2891185912		Admin Leave w/Pay		72	9				
		Totals		2,320	290	182	78	24	

Employee 1215456659 — Page 1

Anonymous Employee No.	Pay Period	Type of Leave or Hours Worked	Pay Period No.	Hours	Days	Accrued Annual Leave Hours	Accrued Sick Leave Hours	Accrued Personal Leave Hours	Notes
1215456659	7/23/2012 to 8/5/2012	Regular Hours	16	42	5	8	3		Hours in this row not included in totals at end.
1215456659		Admin Leave w/Pay		40	5				
1215456659	8/6/2012 to 8/19/2012	Admin Leave w/Pay	17	80	10	8	3		
1215456659	8/20/2012 to 9/2/2012	Admin Leave w/Pay	18	80	10	8	3		
1215456659	9/3/2012 to 9/16/2012	Holiday	19	8	1	8	3		
1215456659		Admin Leave w/Pay		72	9				
1215456659	9/17/2012 to 9/30/2012	Admin Leave w/Pay	20	80	10	8	3		
1215456659	10/1/2012 to 10/14/2012	Admin Leave w/Pay	21	80	10	8	3		
1215456659	10/15/2012 to 10/28/2012	Admin Leave w/Pay	22	80	10	8	3		
1215456659	10/29/2012 to 11/11/2012	Admin Leave w/Pay	23	80	10	8	3		
1215456659	11/12/2012 to 11/25/2012	Holiday	24	24	3				Nobody accrued
1215456659		Admin Leave w/Pay		56	7				
1215456659	11/26/2012 to 12/09/2012	Admin Leave w/Pay	25	80	10	8	3		
1215456659	12/10/2012 to 12/23/2012	Admin Leave w/Pay	26	80	10	8	3		
1215456659	12/24/2012 to 1/6/2013	Holiday	1	32	4	8	3		
1215456659		Admin Leave w/Pay		48	6				
1215456659	1/7/2013 to 1/20/2013	Admin Leave w/Pay	2	80	10	8	3		
1215456659	1/21/2013 to 2/3/2013	Holiday	3	8	1	8	3		
1215456659		Admin Leave w/Pay		72	9				
1215456659	2/4/2013 to 2/17/2013	Admin Leave w/Pay	4	80	10	8	3		

Employee 1215456659 — Page 2

Anonymous Employee No.	Pay Period	Type of Leave or Hours Worked	Pay Period No.	Hours	Days	Accrued Annual Leave Hours	Accrued Sick Leave Hours	Accrued Personal Leave Hours	Notes
1215456659	2/18/2013 to 3/3/2013	Admin Leave w/Pay	5	80	10	8	3		
1215456659	3/4/2013 to 3/17/2013	Admin Leave w/Pay	6	80	10	8	3		
1215456659	3/18/2013 to 3/31/2013	Holiday	7	8	1	8	3		
1215456659		Admin Leave w/Pay		72	9				
1215456659	4/1/2013 to 4/14/2013	Admin Leave w/Pay	8	80	10	8	3		
1215456659	4/15/2013 to 4/28/2013	Admin Leave w/Pay	9	80	10	8	3		
1215456659	4/29/2013 to 5/12/2013	Admin Leave w/Pay	10	80	10	8	3		
1215456659	5/13/2013 to 5/26/2013	Admin Leave w/Pay	11	80	10				Nobody Accrued
1215456659	5/27/2013 to 6/9/2013	Holiday	12	8	1	8	3	24	
1215456659		Admin Leave w/Pay		72	9				
1215456659	6/10/2013 to 6/23/2013	Admin Leave w/Pay	13	80	10	8	3		
1215456659	6/24/2013 to 7/7/2013	Holiday	14	8	1	8	3		
1215456659		Admin Leave w/Pay		72	9				
1215456659	7/8/2013 to 7/21/2013	Admin Leave w/Pay	15	80	10	8	3		
1215456659	7/22/2013 to 8/4/2013	Admin Leave w/Pay	16	80	10	8	3		
1215456659	8/5/2013 to 8/18/2013	Admin Leave w/Pay	17	80	10	8	3		
1215456659	8/19/2013 to 9/1/2013	Admin Leave w/Pay	18	80	10	8	3		
1215456659	9/2/2013 to 9/15/2013	Holiday	19	8	1	8	3		
1215456659		Admin Leave w/Pay		72	9				

Employee 1215456659 — Page 3

Anonymous Employee No.	Pay Period	Type of Leave or Hours Worked	Pay Period No.	Hours	Days	Accrued Annual Leave Hours	Accrued Sick Leave Hours	Accrued Personal Leave Hours	Notes
1215456659	9/16/2013 to 9/29/2013	Admin Leave w/Pay	20	80	10	8	3		
1215456659	9/30/2013 to 10/13/2013	Admin Leave w/Pay	21	8	1	0	0		
		Totals		2,448	306	232	87	24	

Employee 4598915932 — Page 1

Anonymous Employee No.	Pay Period	Type of Leave or Hours Worked	Pay Period No.	Hours	Days	Accrued Annual Leave Hours	Accrued Sick Leave Hours	Accrued Personal Leave Hours	Notes
4598915932	3/24/1997 to 4/6/1997	Regular Hours	8	16	2	7	3		Hours in this row not included in totals at end.
4598915932		Holiday		8	1				
4598915932		Admin Leave w/Pay		56	7				
4598915932	4/7/1997 to 4/20/1997	Admin Leave w/Pay	9	80	10	7	3		
4598915932	4/21/1997 to 5/4/1997	Admin Leave w/Pay	10	80	10	7	3		
4598915932	5/5/1997 to 5/18/1997	Admin Leave w/Pay	11	80	10	7	3		
4598915932	5/19/1997 to 6/1/1997	Holiday	12	8	1	7	3		
4598915932		Admin Leave w/Pay		72	9				
4598915932	6/2/1997 to 6/15/1997	Admin Leave w/Pay	13	80	10	7	3		
4598915932	6/16/1997 to 6/29/1997	Admin Leave w/Pay	14	80	10	7	3		
4598915932	6/30/1997 to 7/13/1997	Holiday	15	8	1	7	3		
4598915932		Admin Leave w/Pay		72	9				
4598915932	7/14/1997 to 7/27/1997	Admin Leave w/Pay	16	80	10	7	3	24	
4598915932	7/28/1997 to 8/10/1997	Admin Leave w/Pay	17	80	10	7	3		
4598915932	8/11/1997 to 8/24/1997	Admin Leave w/Pay	18	80	10	0	0		Nobody Accrued
4598915932	8/25/1997 to 9/7/1997	Holiday	19	8	1	7	3		
4598915932		Admin Leave w/Pay		72	9				
4598915932	9/8/1997 to 9/21/1997	Admin Leave w/Pay	20	80	10	7	3		

Employee 4598915932 — Page 2

Anonymous Employee No.	Pay Period	Type of Leave or Hours Worked	Pay Period No.	Hours	Days	Accrued Annual Leave Hours	Accrued Sick Leave Hours	Accrued Personal Leave Hours	Notes
4598915932	9/22/1997 to 10/5/1998	Admin Leave w/Pay	21	80	10	7	3		
4598915932	10/6/1997 to 10/19/1997	Admin Leave w/Pay	22	80	10	7	3		
4598915932	10/20/1997 to 11/2/1997	Admin Leave w/Pay	23	80	10	7	3		
4598915932	11/3/1997 to 11/16/1997	Holiday	24	8	1	7	3		
4598915932		Admin Leave w/Pay		72	9				
4598915932	11/17/1997 to 11/30/1997	Holiday	25	16	2	7	3		
4598915932		Admin Leave w/Pay		64	8				
4598915932	12/1/1997 to 12/14/1997	Admin Leave w/Pay	26	80	10	7	3		
4598915932	12/15/1997 to 12/28/1997	Holiday	1	16	2	7	3		
4598915932		Admin Leave w/Pay		64	8				
4598915932	12/29/1997 to 1/11/1998	Holiday	2	16	2	7	3		
4598915932		Admin Leave w/Pay		64	8				
4598915932	1/12/1998 to 1/25/1998	Admin Leave w/Pay	3	80	10				Nobody Accrued
4598915932	1/26/1998 to 2/8/1998	Admin Leave w/Pay	4	80	10	7	3		
4598915932	2/9/1998 to 2/22/1998	Admin Leave w/Pay	5	80	10	7	3		
4598915932	2/23/1998 to 3/8/1998	Admin Leave w/Pay	6	80	10	7	3		
4598915932	3/9/1998 to 3/22/1998	Admin Leave w/Pay	7	80	10	7	3		
4598915932	3/23/1998 to 4/5/1998	Admin Leave w/Pay	8	80	10	7	3		
4598915932	4/6/1998 to 4/19/1998	Holiday	9	8	1	7	3		
4598915932		Admin Leave w/Pay		72	9				

Employee 4598915932 — Page 3

Anonymous Employee No.	Pay Period	Type of Leave or Hours Worked	Pay Period No.	Hours	Days	Accrued Annual Leave Hours	Accrued Sick Leave Hours	Accrued Personal Leave Hours	Notes
4598915932	4/20/1998 to 5/3/1998	Admin Leave w/Pay	10	80	10	7	3		
4598915932	5/4/1998 to 5/17/1998	Admin Leave w/Pay	11	80	10	7	3		
4598915932	5/18/1998 to 5/31/1998	Holiday	12	8	1	7	3		
4598915932		Admin Leave w/Pay		72	9				
4598915932	6/1/1998 to 6/14/1998	Admin Leave w/Pay	13	80	10	7	3		
4598915932	6/15/1998 to 6/28/1998	Admin Leave w/Pay	14	80	10	7	3		
4598915932	6/29/1998 to 7/12/1998	Holiday	15	8	1	7	3		
4598915932		Admin Leave w/Pay		72	9				
4598915932	7/13/1998 to 7/26/1998	Admin Leave w/Pay	16	80	10			24	Nobody Accrued
4598915932	7/27/1998 to 8/9/1998	Admin Leave w/Pay	17	80	10	7	3		
4598915932	8/10/1998 to 8/23/1998	Admin Leave w/Pay	18	80	10	7	3		
4598915932	8/24/1998 to 9/6/1998	Admin Leave w/Pay	19	80	10	7	3		
4598915932	9/7/1998 to 9/20/1998	Holiday	20	8	1	7	3		
4598915932		Admin Leave w/Pay		72	9				
4598915932	9/21/1998 to 10/4/1998	Admin Leave w/Pay	21	80	10	7	3		
4598915932	10/5/1998 to 10/18/1998	Admin Leave w/Pay	22	80	10	7	3		
4598915932	10/19/1998 to 11/1/1998	Admin Leave w/Pay	23	80	10	7	3		
4598915932	11/2/1998 to 11/15/1998	Holiday	24	8	1	7	3		
4598915932		Admin Leave w/Pay		72	9				

Employee 4598915932 — Page 4

Anonymous Employee No.	Pay Period	Type of Leave or Hours Worked	Pay Period No.	Hours	Days	Accrued Annual Leave Hours	Accrued Sick Leave Hours	Accrued Personal Leave Hours	Notes
4598915932	11/16/1998 to 11/30/1998	<i>Regular Hours*</i>	25	64	8	7	3		*Pay period is regular working hours. Not included in totals below.
4598915932		<i>Holiday*</i>		16	2				
		Totals		3,424	428	280	120	48	